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Via Electronic Mail and ECF

November 18, 2022

Hon. John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. King*, 21 Cr. 56 (JPC)

Dear Judge Cronan:

We write on behalf of our client, Nikia King, to respectfully request that Ms. King's home detention bail conditions be temporarily modified to allow her to attend Thanksgiving festivities with her family in Newark, New Jersey, her last before she begins a five-year prison sentence the following Monday.¹

Ms. King's family is participating in Thanksgiving festivities at the home of her fiancée's mother, Jarlson Kidd-Griffin, in Newark, New Jersey. Ms. King requests permission to attend that gathering on Thanksgiving day, November 24, 2022, from 2:00 p.m. to 12:00 a.m., which will also allow her sufficient time to travel to and from Ms. Kidd-Griffin's home. It will mark a final occasion for the family to gather as one before Ms. King must say her goodbyes.

Pretrial Services opposes the request, advising the defense that "[o]ur office opposes all leave requests for social activities for defendants subject to home detention." The Government takes the same position, writing "we generally defer to pretrial on these issues" and see no "basis to change our position," as the Government objected generally to self-surrender. Neither Pretrial nor the Government voice concern that Ms. King is about to run. Nor could they. Ms. King has an impeccable track record on release and has on several occasions, including *after* sentencing, been permitted by the Court to attend important family events, without objection. At her sentencing proceeding, she gave a heartfelt address in which she accepted that she and her family would face consequences from her choices and begged her family's forgiveness. She is putting her affairs in order, and ready to do her time.

Thanksgiving is a unique American holiday. There are no presents to buy; it excludes no faith. It is a time for us to come together with loved ones, no matter the troubles in our lives, to

¹ Ms. King has not yet been designated to a facility by the Bureau of Prisons. However, a representative of the U.S. Marshal's Service has advised that he expects that Ms. King will be designated by Tuesday, November 22, 2022. If she is not designated to a facility by that time, we may request a brief adjournment in the date of Ms. King's surrender to enable her to surrender directly to her designated facility.

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be grateful for what we still have. It is in this spirit of common humanity that we respectfully request that the Court grant leave for Ms. King, too, to have this moment.

Respectfully submitted,

s/ Arlo Devlin-Brown
Arlo Devlin-Brown
Covington & Burling LLP

cc: All counsel of record via ECF

The request is granted. Defendant may travel to the home of Ms. Jarslon Kidd-Griffith in Newark, New Jersey on November 24, 2022, between 2:00 p.m. and 12:00 a.m. to be with her family for Thanksgiving. The Court wishes Defendant and her family a happy Thanksgiving.

SO ORDERED.

November 18, 2022
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge